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11 *Attorneys for Consolidated Edison*
12 *Development, Inc.*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION**

19 **-and-**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
24 Company
☐ Affects both Debtors

25 ** All papers shall be filed in the Lead,*
26 *Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

**CONSOLIDATED EDISON
DEVELOPMENT INC.'S RESERVATION
OF RIGHTS REGARDING POSTPETITION
INTEREST ON UNSECURED CLAIMS**

Date: December 11, 2019

Time: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket No. 4540

27 Consolidated Edison Development, Inc. ("CED"), through its counsel, hereby reserves all
28 its rights with respect to the "Postpetition Interest Issue," as defined in the *Order Establishing Pre-*

1 *Confirmation Briefing and Hearing Schedule for Certain Legal Issues* [Docket No. 4540] (the
2 “Scheduling Order”), including the right to be heard at the hearing set for December 11, 2019 (the
3 “Hearing”) or any time thereafter.

4 CED is a party to several wholesale power purchase agreements (the “PPAs”) with Pacific
5 Gas and Electric Company (the “Utility” and, together with PG&E Corporation, the “Debtors”). It
6 is CED’s understanding that the Debtors will likely assume the PPAs pursuant to section 365 of the
7 Bankruptcy Code. While CED currently takes no position on the Postpetition Interest Issue, it
8 reserves all its rights on that Issue. Therefore, if the Debtors seek to assume the PPAs, then, pursuant
9 to this reservation of rights, CED may: (1) raise and be heard on whether the PPAs’ interest rates
10 apply to the calculation of amounts owed to cure the Utility’s defaults under the PPAs, and (2)
11 without waiving any rights, refrain from taking, briefing, and arguing a position on the Postpetition
12 Interest Issue until the Debtors seek to assume the PPAs—notwithstanding the Scheduling Order
13 or any decision rendered at or after the Hearing.

14 Dated: November 8, 2019

15 TROUTMAN SANDERS LLP

16 By: /s/ Hugh M. McDonald
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